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Attorneys for Defendant

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

ALBERT L. THOMBS,

Plaintiff,

v.

KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,

Defendant.

) Case No. 2:22-cv-01053-BNW

) **UNOPPOSED MOTION FOR**  
) **EXTENSION OF TIME**  
) **(FIRST REQUEST)**

Defendant Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), through her undersigned counsel, hereby requests a 60 day extension of time, from November 21, 2022 to January 20, 2023, to file her Cross-Motion to Affirm and Response to Plaintiff’s Motion for Reversal and/or Remand in this case.

This is the Commissioner’s first request for an extension. Due to ongoing staffing fluctuations and organizational changes, the undersigned counsel for the Commissioner has been tasked with handling additional cases, delivering attorney training, overseeing other attorneys, and serving as a jurisdictional coordinator. The undersigned is also responsible for over 90 District Court or Ninth

1 Circuit cases, several of which require imminent briefing. Additionally, the undersigned will be  
2 serving as caretaker for an aged parent during the holidays. The Commissioner's counsel therefore  
3 needs additional time in the instant case to review the administrative record, to consider the issues that  
4 Plaintiff has raised, and to prepare the Commissioner's portions of the joint submission.

5 On November 14, 2022, counsel for the Commissioner conferred with Plaintiff's counsel, who  
6 has no opposition to this motion.

7 WHEREFORE, Defendant requests until January 20, 2023, to file her Cross-Motion to Affirm  
8 and Response to Plaintiff's Motion for Reversal and/or Remand.

9  
10 Dated: November 14, 2022

Respectfully submitted,

11 JASON M. FRIERSON  
12 United States Attorney

13 By: /s/ Margaret Branick-Abilla  
14 MARGARET BRANICK-ABILLA  
15 Special Assistant United States Attorney  
16 Attorneys for Defendant

17 IT IS SO ORDERED:

18   
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: November 15, 2022  
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**CERTIFICATE OF SERVICE**

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Daniel S. Jones  
fedcourt@binderlawfirm.com

Hal Taylor  
haltaylorlawyer@gbis.com

Attorneys for Plaintiff

Dated: November 14, 2022

/s/ Margaret Branick-Abilla  
MARGARET BRANICK-ABILLA  
Special Assistant United States Attorney